

Exhibit G

Carey Miller

From: Vincent Russo
Sent: Wednesday, May 26, 2021 12:02 PM
To: Cross, David D.; Jonathan Crumly; Ascarrunz, Veronica; Bryan Tyson; Hedgecock, Lyle F.; Conaway, Jenna B.; cheryl.ringer@fultoncountyga.gov; Carey Miller; Alexander Denton; Dal Burton; Diane LaRoss; Bryan Jacoutot; Loree Anne Paradise; Bruce Brown; Rob McGuire; Cary Ichter; Halsey G. Knapp, Jr.; Adam M. Sparks; Kaiser, Mary; Manoso, Robert W.; Brogan, Eileen M.; Josh Belinfante; Melanie Johnson; Javier Pico-Prats; Rashmi Ahuja; Drina Miller
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

David,

We will get you our portion of the Joint Discovery Statement by 1:30 today. However, you told us several months ago that you would send us Curling's portion of the joint discovery statement but never provided it. After waiting in excess of four months to receive discovery statements you previously promised, you have now demanded we respond at your whim, when you know we are short-handed. Nonetheless, we will provide our portion of the statements by 1:30. If you decide to file without our portion, as you have threatened to do, we will file separately and alert the court to the reasons why, which I doubt would surprise the court.

Vincent

ROBBINS

Vincent R. Russo
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Atlanta, GA 30318
404.856.3260 (Direct)
678.701.9381 (Main)

From: Cross, David D. <DCross@mofo.com>
Sent: Tuesday, May 25, 2021 6:04 PM
To: Jonathan Crumly <jcrumly@taylorenghish.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov; Vincent Russo <vrusso@robbsfirm.com>; Carey Miller <carey.miller@robbsfirm.com>; Alexander Denton <Alexander.Denton@robbsfirm.com>; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Bruce Brown <bbrown@brucebrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <Cichter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; Josh Belinfante <Josh.Belinfante@robbsfirm.com>; Melanie Johnson <melanie.johnson@robbsfirm.com>; Javier Pico-Prats <javier.picoprats@robbsfirm.com>; Rashmi Ahuja <rahuja@taylorenghish.com>; Drina Miller

<dmiller@taylorenghish.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Jonathan -

It isn't possible to address all discovery issues in one submission given the page limits. And that's the exact opposite approach Bryan proposed on a prior call, where he acknowledged the need to file a series of joint submissions on discrete disputes.

In the past, each side typically has provided its response portion within a day or two of receiving the opening portion. There's no reason to depart from that practice here as these issues have been at impasse for months, and we have expert reports due in only about a month that will require the requested discovery urgently.

There are about a dozen lawyers representing State Defendants on this email alone. It appears that only two are out of the office based on messages I received. So you have ample resources to handle a three-page response on issues that have been the subject of extensive discussion and correspondence already (indeed, significantly more lawyers than on our entire team).

Please provide your portion by noon ET tomorrow. Otherwise we'll have to file and alert the Court that you declined to provide your portion. We'd prefer to avoid that, but we can't continue to suffer the substantial prejudice of the delay you've unilaterally imposed on discovery in this case given the current schedule.

Thanks.

DC

From: Jonathan Crumly <jcrumly@taylorenghish.com>

Date: Tuesday, May 25, 2021, 5:01 PM

To: Cross, David D. <DCross@mofo.com>, Ascarrunz, Veronica <VAscarrunz@mofo.com>, Bryan Tyson <btyson@taylorenghish.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Conaway, Jenna B. <JConaway@mofo.com>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, vrusso@robbinsfirm.com <vrusso@robbinsfirm.com>, cmiller@robbinsfirm.com <cmiller@robbinsfirm.com>, adenton@robbinsfirm.com <adenton@robbinsfirm.com>, Dal Burton <dburton@taylorenghish.com>, Diane LaRoss <dlaross@taylorenghish.com>, Bryan Jacoutot <bjacoutot@taylorenghish.com>, Loree Anne Paradise <lparadise@taylorenghish.com>, Bruce Brown <bbrown@brucebrownlaw.com>, Rob McGuire <ram@lawram.com>, Cary Ichter <Cichter@IchterDavis.com>, Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>, Adam M. Sparks <sparks@khlawfirm.com>, Kaiser, Mary <MKaiser@mofo.com>, Manoso, Robert W. <RManoso@mofo.com>, Brogan, Eileen M. <EBrogan@mofo.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Melanie Johnson <melanie.johnson@robbinsfirm.com>, Javier Pico-Prats <javier.picoprats@robbinsfirm.com>, Rashmi Ahuja <rahuja@taylorenghish.com>, Drina Miller <dmiller@taylorenghish.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

External Email

David,

I hope all is well with you and you remain safe in DC.

As you are no doubt aware from the leaves of absence filed with the Court and the “out of office” emails you should have received, many of us are out of the office this week. We received your response this afternoon to our May 14 letter concerning Curling Plaintiffs’ discovery responses and can be available to meet and confer this Thursday. It appears from your letter that some issues will still not be resolved without the Court’s intervention. We are also waiting to hear back from Bruce on the Coalition Plaintiffs’ discovery responses.

Judge Totenberg’s discovery dispute resolution process expressly contemplates the submission of multiple disputes simultaneously. Since we anticipate having to submit multiple discovery issues to Judge Totenberg, we suggest that the parties submit one joint discovery statement covering all of the issues remaining in dispute after we meet and confer on Thursday. This will avoid multiple filings and bogging down Judge Totenberg with continuous discovery disputes. To that end we can be available to talk with both you and Bruce on Thursday about all the open issues and set a uniform schedule for submission of papers to the Court.

I look forward to your response.



Jonathan Crumly

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From: Cross, David D. <DCross@mofo.com>

Sent: Tuesday, May 25, 2021 1:52 PM

To: Ascarrunz, Veronica <VAscarrunz@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenghish.com>; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Bruce Brown <bbrown@brucebrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <Clichter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Melanie Johnson <melanie.johnson@robbinsfirm.com>; Javier Pico-Prats <javier.picoprats@robbinsfirm.com>; Rashmi Ahuja <rahuja@taylorenghish.com>; Drina Miller <dmiller@taylorenghish.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Please provide this by COB today.

Thanks.

From: Cross, David D. <DCross@mofo.com>

Date: Monday, May 24, 2021, 6:25 PM

To: Ascarrunz, Veronica <VAscarrunz@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov

<cheryl.ringer@fultoncountyga.gov>, vrusso@robbinsfirm.com <vrusso@robbinsfirm.com>, cmiller@robbinsfirm.com <cmiller@robbinsfirm.com>, adenton@robbinsfirm.com <adenton@robbinsfirm.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, Dal Burton <dburton@taylorenghish.com>, Diane LaRoss <dlaross@taylorenghish.com>, Bryan Jacoutot <bjacoutot@taylorenghish.com>, Loree Anne Paradise <lparadise@taylorenghish.com>, Bruce Brown <bbrown@brucepbrownlaw.com>, Rob McGuire <ram@lawram.com>, Cary Ichter <CIchter@IchterDavis.com>, Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>, Adam M. Sparks <sparks@khlawfirm.com>, Kaiser, Mary <MKaiser@mofo.com>, Manoso, Robert W. <RManoso@mofo.com>, Brogan, Eileen M. <EBrogan@mofo.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Melanie Johnson <melanie.johnson@robbinsfirm.com>, Javier Pico-Prats <javier.picoprats@robbinsfirm.com>, Rashmi Ahuja <rahuja@taylorenghish.com>, Drina Miller <dmiller@taylorenghish.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

For planning purposes, can you please let us know when to expect your portion?

Thanks.

DC

From: Ascarrunz, Veronica <VAscarrunz@mofo.com>

Date: Friday, May 21, 2021, 5:23 PM

To: Bryan Tyson <btyson@taylorenghish.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Conaway, Jenna B. <JConaway@mofo.com>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, vrusso@robbinsfirm.com <vrusso@robbinsfirm.com>, cmiller@robbinsfirm.com <cmiller@robbinsfirm.com>, adenton@robbinsfirm.com <adenton@robbinsfirm.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, Dal Burton <dburton@taylorenghish.com>, Diane LaRoss <dlaross@taylorenghish.com>, Bryan Jacoutot <bjacoutot@taylorenghish.com>, Loree Anne Paradise <lparadise@taylorenghish.com>, Cross, David D. <DCross@mofo.com>, Bruce Brown <bbrown@brucepbrownlaw.com>, Rob McGuire <ram@lawram.com>, Cary Ichter <CIchter@IchterDavis.com>, Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>, Adam M. Sparks <sparks@khlawfirm.com>, Kaiser, Mary <MKaiser@mofo.com>, Manoso, Robert W. <RManoso@mofo.com>, Brogan, Eileen M. <EBrogan@mofo.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Melanie Johnson <melanie.johnson@robbinsfirm.com>, Javier Pico-Prats <javier.picoprats@robbinsfirm.com>, Rashmi Ahuja <rahuja@taylorenghish.com>, Drina Miller <dmiller@taylorenghish.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Bryan,

Attached is our initial portion of a joint discovery statement. Please provide your portion as indicated below.

Best regards,

Veronica

From: Bryan Tyson

Sent: Monday, May 17, 2021 10:12 AM

To: 'Ascarrunz, Veronica' <VAscarrunz@mofo.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <CIchter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Veronica,

We have already responded to those issues previously and did not respond further because they were not raised in David's letter outlining the "final positions" on outstanding discovery issues on May 11. To the extent you expect a response, our previous letters fully outline our positions on these issues and we'll be ready to fill in our portions of joint discovery statements when and if you send those our way.

Thanks,

Bryan



Bryan P. Tyson

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From: Ascarrunz, Veronica <VAscarrunz@mofo.com>

Sent: Friday, May 14, 2021 7:55 PM

To: Bryan Tyson <btyson@taylorenghish.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <Clichter@lichterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Bryan,

Your letter does not address the below from David's letter to you of April 22, 2021, which we take to mean that we understand your position correctly and so will raise these issues with the Court.

We also understand that you will not produce (i) documents with appropriate metadata, (ii) Dominion EMS DVD files, (iii) any documents concerning Dominion, (iv) documents related to EMS databases, (v) any fully-configured EMS, (vi) any fully-configured ICC, or (vii) any BMD equipment or peripherals. Please let me know if that understanding is incorrect before we raise these issues with the Court, which we intend to do expeditiously if needed.

Best,

Veronica Ascarrunz

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Friday, May 14, 2021 5:27 PM

To: Hedgecock, Lyle F. <LHedgecock@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <Cichter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Bryan Tyson <btyson@taylorenghish.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

External Email

All:

Please find attached State Defendants' letter responding to Mr. Cross's letter and outlining our discovery positions as we discussed.

Have a great weekend,

Bryan



Bryan P. Tyson

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From: Hedgecock, Lyle F. <LHedgecock@mofo.com>

Sent: Tuesday, May 11, 2021 10:02 PM

To: Conaway, Jenna B. <JConaway@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; cheryl.ringer@fultoncountyga.gov; vrusso@robbinsfirm.com; cmiller@robbinsfirm.com; adenton@robbinsfirm.com; Jonathan Crumly <jcrumly@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Cross, David D. <DCross@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Rob McGuire <ram@lawram.com>; Cary Ichter <Cichter@IchterDavis.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>;

Manoso, Robert W. <RManoso@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>

Subject: Curling v. Raffensperger, No. 1:17-cv-2989-AT (N.D. Ga.)

Mr. Tyson,

Please find attached a letter from Mr. Cross concerning discovery.

Best,

LYLE HEDGECOCK

Associate | Morrison & Foerster LLP

2100 L Street, NW, Suite 900 | Washington, DC 20037

P: +1 (202) 572-6769

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